

# Holland & Knight

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October 5, 2016

*Via ECF*

Honorable Pamela K. Chen, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Webb et al.*, Crim. No. 15-252 (PKC) (RML)

Dear Judge Chen:

We represent Mr. Aaron Davidson in the above-captioned action. Judge Dearie imposed bail restrictions on Mr. Davidson pursuant to two Orders, the first on May 29, 2015 and the second on June 17, 2015. As part of those restrictions, Mr. Davidson's wife was ordered to surrender her passport to the Federal Bureau of Investigation.

We are seeking a modification of Mr. Davidson's bail restrictions. Specifically, Mr. Davidson's wife requests the return of her passport to travel abroad, without Mr. Davidson, from October 18 through October 24, 2016 to visit her family. Upon her return, her passport will again be surrendered to the FBI. Judge Dearie previously granted a similar request.

We have communicated this request—including Mr. Davidson's wife's destination—to the United States Attorney's Office, as well as Pretrial Services, and neither objects.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/ Lee Vartan

Lee Vartan